

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

VALARIE WHITNER, VINCENT BLOUNT, and )  
MILDRED BRYANT, individually and on behalf )  
of all others similarly situated, )  
 )  
Plaintiffs, )  
v. ) Civil Case No. 4:15-cv-01655-RWS  
 )  
CITY OF PAGEDALE, a Missouri municipal )  
corporation, )  
 )  
Defendant. )

## PROPOSED JOINT AMENDED CLASS CERTIFICATION SCHEDULE

In accordance with this Court's order of September 20, 2016 (ECF No. 60), the parties, by and through their counsel, jointly submit this proposed amended briefing schedule for class certification. Because of outstanding discovery issues, this proposed schedule sets out a briefing schedule that stems from the currently unknown date of the resolution of such issues to the Court's satisfaction.

1. Plaintiffs will file their Motion to Certify the Proposed Class **within eight weeks after resolution of the outstanding discovery issues.**
2. Defendant will file its Opposition to Plaintiffs' Motion **within twelve weeks after resolution of the outstanding discovery issues.**
3. Plaintiffs will file their Reply in Support of Class Certification **within fourteen weeks after resolution of the outstanding discovery issues.**

4. Plaintiffs intend to request oral argument in their Motion and the parties recommend that the Court hear argument **within eighteen weeks after the resolution of the outstanding discovery issues.**

DATED this 30<sup>th</sup> day of September, 2016.

Respectfully submitted,

**INSTITUTE FOR JUSTICE**

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 30<sup>th</sup> day of September, 2016, this ***PROPOSED JOINT AMENDED CLASS CERTIFICATION SCHEDULE*** was electronically served on the below parties using the CM/ECF system of the United States District Court for the Eastern District of Missouri:

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